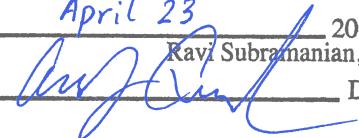


1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
4 DISTRICT COURT at Seattle, Washington.

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April 23 2025
Kavi Subramanian, Clerk
By  Deputy

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6 UNITED STATES DISTRICT COURT FOR THE
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9
10 UNITED STATES OF AMERICA,

11 Plaintiff

12 v.

- 13 1. MARQUIS JACKSON,
14 2. MARKELL JACKSON,
15 3. MANDEL JACKSON,
16 4. EDGAR VALDEZ,
17 5. KEONDRE JACKSON,
18 6. MICHAEL YOUNG,
19 7. SIR TERRIQUE MILAM,
20 8. TYRELL LEWIS,
21 9. ROBERT JOHNSON,
22 10. MATELITA JACKSON,
23 11. MIRACLE PATU-JACKSON,
24 12. DIYANA ABRAHA,
13 15. ROBERT BELLAIR,
14 16. RONALD FINKBONNER,
15 17. PATRICK JAMES,
16 19. CHAD CONTI,
17 20. PHILLIP LAMONT ALEXANDER,
18 21. TREYVON MITCHELL, and
19 22. DEJAUN RANSAW.

NO. CR24-164 JNW

SECOND SUPERSEDING INDICTMENT

Defendants.

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Second Superseding Indictment - 1
United States v. Jackson et al., CR24-164 JNW
USAO No. 202300950

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown, and continuing until at least October 2, 2024, in Pierce, Snohomish, and Whatcom Counties, within the Western District of Washington, and elsewhere, MARQUIS JACKSON, MARKELL JACKSON, MANDEL SON, EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR IQUE MILAM, TYRELL LEWIS, ROBERT JOHNSON, MATELITA SON, MIRACLE PATU-JACKSON, DIYANA ABRAHA, ROBERT BELLAIR, ALD FINKBONNER, PATRICK JAMES, CHAD CONTI, PHILLIP LAMONT ANDER, TREYVON MITCHELL, DEJAUN RANSAW, and others known and own, did knowingly and intentionally conspire to distribute controlled substances, including: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), N-(4-phenyl)-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide (p-fluorofentanyl – a phenyl analogue), methamphetamine, and marihuana, substances controlled under 1, United States Code.

The Grand Jury further alleges that with respect to MARQUIS JACKSON, KELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE SON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS, KRT JOHNSON, MATELITA JACKSON, MIRACLE PATU-JACKSON, NA ABRAHA, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK S, CHAD CONTI, PHILLIP LAMONT ALEXANDER, TREYVON MITCHELL, EJAUN RANSAW, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 400 grams or more of a mixture or substance containing fentanyl, in violation of Title 21, United States Code, Sections 841(b)(1)(A).

1 The Grand Jury further alleges that with respect to MARQUIS JACKSON,
2 MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE
3 JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS,
4 ROBERT JOHNSON, MATELITA JACKSON, MIRACLE PATU-JACKSON,
5 DIYANA ABRAHA, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK
6 JAMES, CHAD CONTI, PHILLIP LAMONT ALEXANDER, TREYVON MITCHELL,
7 and DEJAUN RANSAW, their conduct as members of the conspiracy charged in
8 Count 1, which includes the reasonably foreseeable conduct of other members of the
9 conspiracy charged in Count 1, involved 100 grams or more of a mixture and substance
10 containing a detectable amount of any fentanyl analogue, in violation of Title 21, United
11 States Code, Sections 841(b)(1)(A).

12 The Grand Jury further alleges that with respect to EDGAR VALDEZ, their
13 conduct as members of the conspiracy charged in Count 1, which includes the reasonably
14 foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50
15 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, and 500
16 grams or more of a mixture or substance containing a detectable amount of
17 methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21,
18 United States Code, Sections 841(b)(1)(A).

19 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
20 841(b)(1)(D), and 846.

COUNT 2

(Conspiracy to Commit Money Laundering)

A. The Conspiracy

24 Beginning at a time unknown, and continuing until at least October 2, 2024, in
25 King, Pierce, Snohomish, and Whatcom Counties, within the Western District of
26 Washington, and elsewhere, MARQUIS JACKSON, MARKELL JACKSON,

1 MATELITA JACKSON, DIYANA ABRAHA, and others known and unknown, did
2 knowingly combine, conspire, and agree with each other and with other persons known
3 and unknown to the Grand Jury to commit offenses against the United States in violation
4 of Title 18, United States Code, Section 1956, to wit:

5 1. To knowingly conduct and attempt to conduct financial transactions
6 affecting interstate commerce and foreign commerce, which transactions involved the
7 proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled
8 Substances as charged in Count 1, knowing that the transactions were designed in whole
9 or in part to conceal and disguise the nature, location, source, ownership, and control of
10 the proceeds of specified unlawful activity, and that while conducting and attempting to
11 conduct such financial transactions, knew that the property involved in the financial
12 transactions represented the proceeds of some form of unlawful activity, in violation of
13 Title 18, United States Code, Section 1956(a)(1)(B)(i); and

14 2. To knowingly conduct and attempt to conduct financial transactions
15 affecting interstate commerce and foreign commerce, which transactions involved the
16 proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled
17 Substances as charged in Count 1, knowing that the transactions were designed in whole
18 or in part to avoid a transaction reporting requirement under State or Federal Law, and
19 that while conducting and attempting to conduct such financial transactions, knew that
20 the property involved in the financial transactions represented the proceeds of some form
21 of unlawful activity, in violation of Title 18, United States Code, Section
22 1956(a)(1)(B)(ii).

23 All in violation of Title 18, United States Code, Section 1956(h).

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COUNT 3

(Distribution of a Controlled Substance)

On or about October 31, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl and p-fluorofentanyl (a fentanyl analogue), substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that the offense involved 100 grams or more of a mixture and substance containing a detectable amount of any fentanyl analogue.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 4

(Distribution of a Controlled Substance)

On or about December 7, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 5

(Distribution of a Controlled Substance)

On or about March 7, 2024, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, ROBERT JOHNSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

13 The Grand Jury further alleges that the offense involved 400 grams or more of a
14 mixture or substance containing fentanyl.

15 The Grand Jury further alleges that this offense was committed during and in
16 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
17 Substances).

18 All in violation of Title 21, United States Code, Sections 841(a)(1) and
19 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6

(Possession with Intent to Distribute a Controlled Substance)

On or about December 7, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, ROBERT BELLAIR, MARKELL JACKSON, and others known and known, did knowingly and intentionally possess, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 7

(Possession with Intent to Distribute a Controlled Substance)

On or about February 9, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 841(b)(1)(C).

COUNT 8

(Possession with Intent to Distribute a Controlled Substance)

On or about July 22, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

1 The Grand Jury further alleges that this offense was committed during and in
 2 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
 3 Substances).
 4

5 All in violation of Title 21, United States Code, Sections 841(a)(1) and
 6 841(b)(1)(C).
 7

COUNT 9

(Possession with Intent to Distribute a Controlled Substance)

8 On or about August 21, 2024, in Whatcom County, within the Western District of
 9 Washington, and elsewhere, PATRICK JAMES did knowingly and intentionally possess,
 10 and aid and abet the possession of, with the intent to distribute, a controlled substance,
 11 including: fentanyl, a substance controlled under Title 21, United States Code.
 12

13 The Grand Jury further alleges that the offense involved 40 grams or more of a
 mixture or substance containing fentanyl.
 14

15 The Grand Jury further alleges that this offense was committed during and in
 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
 16 Substances).
 17

18 All in violation of Title 21, United States Code, Sections 841(a)(1) and
 841(b)(1)(B) and Title 18, United States Code, Section 2.
 19

COUNT 10 - RESERVED

COUNT 11

(Possession with Intent to Distribute a Controlled Substance)

20 On or about October 2, 2024, in King County, within the Western District of
 21 Washington, and elsewhere, CHAD CONTI did knowingly and intentionally possess,
 22 with the intent to distribute, a controlled substance, including: fentanyl and
 23 p-fluorofentanyl (a fentanyl analogue), substances controlled under Title 21, United
 24 States Code.
 25

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 12

(Possession with Intent to Distribute a Controlled Substance)

On or about October 2, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, PHILLIP LAMONT ALEXANDER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 13

(Possession with Intent to Manufacture and Distribute a Controlled Substance)

On or about October 2, 2024, in King County, within the Western District of Washington, and elsewhere, MANDEL JACKSON, DEJAUN RANSAW, and others known and unknown, did knowingly and intentionally manufacture and possess, with the intent to distribute, and aid and abet the manufacture and possession of, with intent to

1 distribute, a controlled substance, including: marijuana, a substance controlled under
2 Title 21, United States Code.

3 The Grand Jury further alleges that this offense was committed during and in
4 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
5 Substances).

6 All in violation of Title 21, United States Code, Sections 841(a)(1) and
7 841(b)(1)(D).

FORFEITURE ALLEGATION

10 The allegations contained in Counts 1 through 9 and 11 through 13 of this
11 Indictment are hereby realleged and incorporated by reference for the purpose of alleging
12 forfeiture.

Upon conviction of any of the offenses alleged in Counts 1, 3 through 9, and 11 through 13, MARQUIS JACKSON, MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS, ROBERT JOHNSON, MATELITA JACKSON, MIRACLE PATU-JACKSON, DIYANA ABRAHA, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK JAMES, CHAD CONTI, PHILLIP LAMONT ALEXANDER, TREYVON MITCHELL, and DEJAUN RANSAW shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any property constituting or derived from proceeds traceable to the offense, as well as any property used or intended to be used to facilitate the offense.

Upon conviction of the offense alleged in Count 2, MARQUIS JACKSON, MARKELL JACKSON, MATELITA JACKSON, and DIYANA ABRAHA, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any

1 property, real or personal, involved in the offense, or any property traceable to such
2 property.

3 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
4 any act or omission of the defendants,

- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a third party;
- 7 c. has been placed beyond the jurisdiction of the Court;
- 8 d. has been substantially diminished in value; or
- 9 e. has been commingled with other property which cannot be divided
10 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

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5 A TRUE BILL:

6

DATED: *4/23/2025*

7

*Signature of Foreperson redacted pursuant
to the policy of the Judicial Conference of
the United States.*

8

9 FOREPERSON

10

Signature of Teal Luthy Miller
11 TEAL LUTHY MILLER
12 Acting United States Attorney

13

Signature of Vincent T. Lombardi
14 VINCENT T. LOMBARDI
15 Assistant United States Attorney

16

Signature of Zachary W. Dillon
17 ZACHARY W. DILLON
18 Assistant United States Attorney

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